TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 17, 2013

MR MIKE TITTLE
PLANT MANAGER
3M COMPANY
4501 HIGHWAY 377 S
BROWNWOOD TX 76801-5907

Re: Permit Application
Permit Number: 71623
3M Brownwood
Brownwood, Brown County
Regulated Entity Number: RN100219005
Customer Reference Number: CN600291397
Account Number: BQ-0009-S
Associated Permit Number: PAL4

Dear Mr. Tittle:

This is in response to your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the above-referenced facility. Also, this will acknowledge that your application for the above-referenced permit is technically complete as of February 6, 2013.

A permit for your facility is enclosed. The permit contains several general and special conditions that define the level of operation, a maximum allowable emission rates table, and a permit face. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met. In addition, the construction and operation of the facilities must be as represented in the application.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit for the sources authorized by this permit. The process and general facility MSS activities not currently authorized in your permit are authorized either as De Minimis sources under Title 30 Texas Administrative Code (30 TAC) § 116.119 or meet the requirements for a permit by rule (PBR) under 30 TAC Chapter 106. As required by 30 TAC § 106.8, adequate records must be maintained at the facility to demonstrate that the requirements of the applicable PBRs are consistently met, and adequate records should be maintained at the facility to demonstrate that the requirements for De Minimis sources are consistently met. Any other planned MSS activities not authorized will need to obtain separate authorization.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an

Re: Permit Number: 71623

action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Thank you for your cooperation and interest in air pollution control. If you need further information or have any questions, please contact Mr. Mike Coldiron, P.E. at (512) 239-5027 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/mc

Enclosure

cc: Air Section Manager, Region 3 - Abilene
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 175283

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT

A Permit Is Hereby Issued To
3M Company
Authorizing the Construction and Operation of
3M Brownwood
Located at **Brownwood, Brown County, Texas**
Latitude 31° 40′ 14″ Longitude 98° 59′ 48″

Permit: 71623 and PAL4

Amendment Date : May 17, 2013

Renewal Date: June 22, 2016

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
2. **Voiding of Permit**. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of $5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
3. **Construction Progress**. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
4. **Start-up Notification**. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
5. **Sampling Requirements**. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

Special Conditions

Permit Number 71623

and

Plant-Wide Applicability Limit Permit Number 4

1. This permit covers reflective sheeting manufacturing facilities located at 4501 Highway 377 South, Brownwood, Brown County. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in that attached table and permit conditions. Annual emission rates are calculated over a consecutive 12-month period.

Special Condition for New, Replacement, and Modified Facilities

2. This permit allows for the construction, replacement, and modification of sources over the original 10-year term of the permit as follows:

   A. The following facility types may be constructed under this permit and the maximum number of such facilities that may exist at the site at any time in addition to facilities authorized under 30 Chapter 106 (30 TAC Chapter 106) are as follows:

Emission Source Description	Maximum Number of Sources at Site (1)
Web Coating Lines	21
Pressure Sensitive Tape and Label Material Lines	10
Product and Packaging Rotogravure or Wide-Web Flexographic Printing Lines	7
Coating Mixing and Blending Vessels	42
Coating Packaging Lines	8
Roll Mills and other Coating Mills	12
Parts Washers	10
Chromium Plating/Anodizing Lines	3
Storage Tanks (not authorized under 30 TAC Chapter 106)	10

(1) The numbers indicated do not include facilities authorized under 30 TAC Chapter 106

   B. This permit authorizes the permit holder to replace any facility covered in this permit with a facility that functions in the same or similar manner so long as the replacement facilities meet the requirements of Special Condition No. 2A,

complies with all applicable permit conditions, the replacement facility emissions do not cause an exceedance of the PAL, and emissions are included in recordkeeping and calculation of the PAL.

C. The permit authorizes the permit holder to modify any facility covered by the permit, modify any facility installed or replaced under Special Condition No. 2A or B, or implement a change inconsistent with any representation of the permit application so long as such modification or change does not cause an exceedance of the PAL and emissions are included in recordkeeping and calculation of the PAL. Such authorization provided under this condition shall not apply to modifications involving removal of any existing air pollution control device unless it is replaced by a new control device achieving equivalent emissions control levels; or unless operation of the facility is provided for under Title 40 Code of Federal Regulation Part 63 (40 CFR Part 63), Subpart JJJJ. This special condition does not apply to control devices that are facilities themselves, except for removals consistent 40 CFR Part 63, Subpart JJJJ as noted above.

D. Special Condition No. 2A, B and C do not limit permit holder's ability to claim and use permits by rule or standard permits at the site in accordance with the regulations of the Texas Commission on Environmental Quality (TCEQ).

E. Any project authorized pursuant to Special Condition No. 2A, B and C, permit by rule, or other applicable TCEQ permitting mechanism, including a permit amendment for the addition of new facilities, shall not require public notice.

F. The total emissions increase for all projects authorized pursuant to Special Condition No. 2A, B and C, permit by rule, or other applicable TCEQ permitting mechanism, including a permit amendment for the addition of new facilities shall not exceed the following:

Air Contaminant	Emission Rate (tpy)
NO_x	39.00
CO	99.90
PM_{10}	14.90
$PM_{2.5}$	9.90
SO_2	39.00

Annual emission increases above these levels shall be authorized by a permit amendment that shall include a federal New Source Review applicability analysis.

G. For any project authorized pursuant to Special Condition No. 2A, B and C, including each instance of setting a new emission point, relocating an existing emission point, or modifying the stack characteristics of an existing emission point, where applicable, a demonstration of compliance with all applicable National Ambient Air Quality Standards (NAAQS) and state property line standards shall be determined using a TCEQ-approved air dispersion model as follows:

(i) For demonstration of compliance with the NAAQS, project-specific emission impacts compared to the respective Significant Impact Levels (SILs);

(ii) If the SIL is exceeded, post-project, total-facility emissions and the impacts from surrounding sources as required and an appropriate background concentration shall be compared to the respective standards;

(iii) Post-project, total-facility emissions concentrations shall be compared to the respective state property line standards; or

(iv) Other methods approved by TCEQ Office of Air, Air Permits Division.

Procedures, as described in the most current version of the TCEQ Air Quality Modeling Guidelines and specific guidance from the TCEQ Air Dispersion Modeling Team, shall be used where appropriate.

3. The facilities authorized under this permit are subject to the construction schedule and control technology review requirements of 30 TAC § 116.120. Authorization of facilities under 30 TAC Chapter 106 shall be considered as part of this project and will be taken into consideration in the evaluation of the construction schedule requirements of 30 TAC § 116.120.

Plant-wide Applicability Limit

4. Any project to be authorized pursuant to Special Condition No. 2A, B, and C, permit by rule (30 TAC Chapter 106), or other TCEQ permitting mechanisms, including a permit amendment for the addition of new facilities, shall not be subject to federal new source review for volatile organic compounds (VOC) provided the total actual plant-wide emissions of VOC do not exceed the PAL established for this site of 999.0 tons per year (tpy).

A. The PAL shall be established for a period of ten years. Physical changes and changes in method of operation at this site are exempt from Federal New Source Review for VOC as long as site emissions do not exceed the PAL.

B. If future actual emission rates calculated for an air pollutant exceed the PAL thresholds listed above, the permittee shall be subject to federal new source review for that air pollutant. Only the changes that cause the new emission rates to exceed the PAL threshold are subject to federal new source review. The permittee shall submit to the TCEQ a federal new source review permit application for the changes that cause actual emissions to exceed the PAL thresholds for any such air pollutant.

C. The current PAL listed above must be adjusted downward where emissions reductions are necessary to comply with any future State Implementation Plan. The lower PAL is effective on the effective date of the more stringent regulation. Within 12 months of the effective date of the regulation, the permittee shall submit a request to alter or amend the permit to reflect the more stringent emission rates. After ten years at the time of permit renewal, the permit holder shall submit a request to alter or amend the permit conditions to renew the existing PALs.

Emission Limitations and Federal Applicability

5. The opacity shall not exceed five percent (except for those periods described in 30 TAC §§ 101.201 and 101.211) averaged over a six-minute period from each stack or vent. This determination shall be made by first observing for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission point(s). Up to three emissions points may be read concurrently, provided that all three emissions points are within a 70 degree viewing sector or angle in front of the observer such that the proper sun position (at the observer's back) can be maintained for all three emission points. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. Observations shall be performed and recorded quarterly. If the opacity exceeds five percent, corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one week of first observation.

6. The web coating, product and packaging rotogravure, wide web flexographic printing, and operations shall comply with the more stringent of the following as applicable:

A. National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subparts A and JJJJ.

B. National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63, Subparts A and KK.

7. The pressure sensitive tape and label operations shall comply with the Standards of Performance Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR Part 60, Subparts A and RR. Compliance with either of the following shall constitute compliance with 40 CFR Part 60, Subparts A and RR:

A. National Emission Standards for Hazardous Air Pollutants (HAPs): Paper and Other Web Coating, 40 CFR Part 63, Subparts A and JJJJ, where this standard is applied on the basis of volatile organics rather than organic HAP according to 40 CFR § 63.3370, or

B. National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63, Subparts A and KK, where this standard is applied on the basis of volatile organics rather than organic HAP.

8. The chromium plating operations shall comply with the National Emission Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63, Subparts A and N.

9. As of the applicable compliance date, the mix and mill operations shall comply with the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subparts A and HHHHH.

10. As of the applicable compliance date, the loading/unloading racks shall comply with the National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), 40 CFR Part 63, Subparts A and EEEE.

11. If any condition of this permit is more stringent than the regulation so incorporated, then for the purposes of complying with this permit, the permit condition shall govern and be the standard by which compliance shall be demonstrated.

Operating Restrictions

12. All combustion sources covered by this permit shall be fueled by pipeline-quality, sweet natural gas as supplied by the gas distributor. Use of an alternative fuel will require an amendment to this permit.

13. The emissions stacks for emissions sources covered by this permit shall not be equipped with rain protection that causes restrictions or obstructions to vertical flow.

14. All doors and hallways which are associated with the manufacturing areas that are part of an enclosure or system for capturing and routing of emissions to an air pollution control device shall remain closed or covered except to allow time for the ingress and egress of personnel, equipment, or supplies in order to minimize fugitive emissions.

Emission Control and Performance Standards

15. This permit authorizes the operation of emission sources with any of the following emission control and performance standards regardless of the date of construction as follows:

    A. For sources subject to the requirements of Special Condition No. 6 and 40 CFR § 63.3320, VOC emissions must be limited to the level specified in paragraph (1), (2), (3), or (4)of this section:

        (1) No more than 5 percent of the VOC applied each month (95 percent reduction) considering capture efficiency and destruction efficiency; or

        (2) No more than 4 percent of the mass of coating materials applied for each month; or

        (3) No more than 20 percent of the mass of coating solids applied for each month; or

        (4) If a thermal oxidizer is used to control VOC emissions, the thermal oxidizer outlet VOC concentration shall not exceed 20 parts per million by volume, dry (ppmvd) and the efficiency of the capture system shall be 100 percent.

    These emission standards apply to the entire collection of lines subject to the requirement of Special Condition No. 6. The site may elect in any month, to apply more than one of the above emission standards to the collection of lines: that is, any of the above four options may be elected for the entire collection of lines or for any subset of the collection, so long as each line

subject to the requirements of Special Condition No. 6 meets at least one of the emission standards each month. Compliance with the standards shall be demonstrated on a monthly basis.

B. For sources subject to the requirements of Special Condition No. 7 and 40 CFR § 63.3320, VOC emissions must be limited to the level specified in paragraph (1), (2), (3), or (4)of this section:

(1) No more than 5 percent of the VOC applied each month (95 percent reduction) considering capture efficiency and destruction efficiency; or

(2) No more than 4 percent of the mass of coating materials applied for each month; or

(3) No more than 20 percent of the mass of coating solids applied for each month; or

(4) If a thermal oxidizer is used to control VOC emissions, the thermal oxidizer outlet VOC concentration shall not exceed 20 ppmvd and the efficiency of the capture system shall be 100 percent.

These emission standards apply to the entire collection of lines subject to the requirement of Special Condition No. 7. The site may elect in any month to apply more than one of the above emission standards to the collection of lines: that is, any of the above four options may be elected for the entire collection of lines or for any subset of the collection so long as each line subject to the requirements of Special Condition No. 7 meets at least one of the emission standards each month. Compliance with the standards shall be demonstrated on a monthly basis.

C. For sources subject to the requirements of Special Condition No. 8, the emission controls/limitations authorized by this permit are as follows:

(1) The total concentration of chromium at the exhaust of each affected source shall not exceed 0.015 milligram per dry standard cubic meter (mg/dscm).

(2) Emissions from the chromium plating operation shall be controlled through the use of a composite mesh pad scrubber, packed bed scrubber, fiber bed mist eliminator, foam blanket, or fume suppressant.

(3) All chromium plating tanks shall be equipped with a hooding system containing mesh pad mist eliminators and with sufficient airflow to capture 100 percent of the chromic acid mist.

(4) Short-term emission limits are based on a maximum current of 30,000 amperes for all chromium plating tanks combined.

(5) Annual emission limits are based on (and each tank is limited to) a maximum annual schedule of operations of 8,760 hours.

D. For the mix and mill operation, the emission controls/limitations authorized by this permit, whether or not it is subject to the requirements of Special Condition No. 9, are as follows:

(1) Manufacturing operations shall not be conducted unless the dust collectors and building ventilation systems in the production and packaging areas are fully operational.

(2) The mixer/disperser tanks shall be equipped with a dust collector with a particulate removal efficiency of at least 99.9 percent. The dust collector capture and control system shall be operated and maintained in accordance with the manufacturer's recommendations as to assure that the minimum control efficiency is met at all times. The holder of this permit shall install, calibrate, and maintain a device to monitor pressure drop in each filter system. The pressure drop gauge shall be installed across the filter system and show that the differential pressure is maintained within the pressure drop limits as defined by the manufacturer. The monitoring device for each system shall be calibrated in accordance with the manufacturer's specifications and shall be calibrated at least annually and shall be accurate to within a range ± 0.5 inch water gauge pressure (± 125 pascals) or a span of ± 3.0 percent. Pressure drop readings shall be recorded at least once per week that the system is required to be operated. If the filter system operating performance parameters are outside of the manufacturer's recommended operating range, the affected facility shall not be in operation until the abatement equipment is repaired.

(3) Each mixer/disperser tank or kettle which is equipped with an organic solvent based automatic cleaning system shall be equipped with vented covers that shall be closed except for material additions or coating sample retrieval during mixing operations such that when in place, it maintains contact with the rim of the opening with a minimum opening for the disperser shaft. All other mixer/disperser and kettles except for any tanks or kettles used for water-based coatings, shall be equipped with covers that shall be closed except for material additions or coating sample retrieval during mixing operations such that when in place it maintains contact with the rim of the opening with a minimum opening for the disperser shaft.

E. For the liquid storage tanks and the transfer rack the emission controls/limitations authorized by this permit, whether or not it is subject to the requirements of Special Condition No.9, are as follows:

(1) The maximum liquid transfer rate to Tank ST-5 shall not exceed 70 gallons per minute.

(2) The maximum annual throughput for Tank ST-5 shall not exceed 400,000 gallons per year.

(3) All storage tanks containing organic solvents or organic solvent-based materials shall be painted white or beige.

(4) All solvent storage tanks shall not exceed a nominal storage capacity of 25,000 gallons each and shall be equipped with a submerged fill pipe as defined in 30 TAC § 101.1(97).

F. Cold solvent cleaning units (degreasers, parts washers, etc.), except those authorized under 30 TAC Chapter 106, the emission controls/limitations authorized by this permit are as follows:

(1) Each cleaner shall be equipped with a tightly fitting cover that shall be kept closed whenever parts are not being handled in the cleaner.

(2) The solvent or blend of solvents used in each cleaner shall have an average vapor pressure less than 45 mmHg at 20°C.

(3) Each cleaner shall be equipped with an internal cleaned parts draining facility for enclosed draining under the cover.

(4) If the unit is equipped with a solvent spray, it must be a solid fluid stream, with an operating pressure of 10 psig or less as necessary to prevent splashing above the freeboard.

(5) A permanent label shall be attached to or near the cleaner in a conspicuous location near the operator and shall include proper work practices as follows:

a. Waste solvent shall not be disposed of or transferred to another party such that the waste solvent can evaporate into the atmosphere. Waste solvents shall be stored only in covered containers or be placed into the plant waste solvent management system;

b. The cleaner cover shall be kept closed whenever parts are not being handled in the cleaner;

c. Parts shall be drained for at least 15 seconds or until dripping ceases. Parts having cavities or blind holes shall be tipped or rotated while draining;

d. Porous or absorbent materials, such as cloth, leather, wood, or rope shall not be cleaned; and

e. The solvent shall not be heated.

Thermal Oxidizer

16. The Regenerative Thermal Oxidizer (RTO) (Emission Point No. [EPN] TO-1) shall operate under the following limitations:

A. The nominal operating temperature in the combustion chamber shall be equal to or greater than 1453°F based on a rolling three-hour block average, or other temperature for which stack testing has demonstrated that an overall control efficiency of at least 97.5 percent is achieved. In addition, if the emission standard in Special Condition No. 15A(4) or B(4) is elected, the maximum outlet VOC concentration shall not exceed 20 ppmvd.

B. Temperature monitors shall be used to continuously measure and record the gas temperature in the RTO combustion chamber. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius or ±1°C, whichever is greater. One-hour averages may be computed from four or more data points equally-spaced over each one-hour period to determine compliance with Special Condition No. 7B.

Valid data from at least 90 percent of the hours during which the process is operated shall be obtained. To calculate a valid hourly value, at least three of four equally spaced data values from that hour must be obtained. Data recorded during scheduled maintenance, continuous monitoring system breakdown and repair, and calibration checks shall not be included.

The rolling three-hour block average shall be determined from at least two of three hourly averages for that period using only average values that are based on valid data.

C. Before using a temperature sensor for the first time or when relocating or replacing a sensor, a validation check shall be performed by comparing the

sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.

D. An accuracy audit of the temperature sensors shall be conducted every quarter. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices. If a temperature sensor fails or if a temperature sensor is not validated by an accuracy audit, the oxidizer shall be shutdown according to the Startup, Shutdown, and Malfunction Plan and the sensor shall be repaired or replaced.

E. The RTO operating instructions shall be established and shall be readily available and understandable to all operators.

F. The RTO shall be operated and maintained in conformance with all manufacturer's specifications and recommendations or equal.

G. The coating lines exhausted through the RTO shall be equipped with an automatic shutdown system that shuts down the coating line when flow is diverted away from the RTO to any bypass line, stack or vent, or other method as provided by 40 CFR § 63.3350(c), or unless allowed by Special Condition No. 15A or B.

Capture Systems

17. Capture systems for air pollutants shall be operated as follows, as applicable.

A. All chromium plating/anodizing operations constructed after the initial approval date of this permit shall have a capture system collection efficiency of 100 percent.

If the capture system meets the criteria of the U.S. Environmental Protection Agency (EPA) Reference Method 204 then the system will be assumed to achieve 100 percent capture of emissions. For all other capture system designs the capture efficiency will initially be demonstrated through the use of EPA Reference Methods 204A through 204F as appropriate, or by any other method approved by the TCEQ.

B. For all capture systems (maker, bay room enclosure, booth, etc.) for VOC air contaminants a monitoring plan shall be developed that:

(1) Identifies the operating parameter(s) to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained;

(2) Explains why this parameter is appropriate for demonstrating ongoing compliance;

(3) Identifies the specific monitoring procedures to be used including the monitoring frequency; and

(4) Specifies the operating parameter range of values that shall be maintained to demonstrate that the capture efficiency requirements of the capture system are being maintained. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

C. For all capture systems (maker, bay room enclosure, booth etc.) for VOC air contaminants, the parameter used to determine capture shall be measured and recorded on a monthly basis.

18. All production and pollution control equipment and connecting ductwork shall be inspected monthly by facility personnel for physical defects such as holes, cracks, or any gaps that may cause leaks and excess emissions or losses in capture efficiency. Monthly checks for damper movement shall be made to determine proper action. If there are any physical defects which cause excess emissions, or if proper damper action is not apparent, the affected process equipment must be immediately removed from service. Repairs or adjustments must be made before the unit is returned to service. Physical defects which do not cause excess emissions shall be repaired expeditiously as defined in the Startup, Shutdown, and Malfunction Plan.

Chemical Flexibility

19. This permit allows the substitution of materials or the introduction of new materials that will emit VOC, exempt solvent, and PM if the following conditions are met:

A. For new or replacement material 100 percent of the new or replacement material contents shall be known. This requirement may be satisfied by material safety data sheets (MSDS) or other data sheets to provide 100 percent categorization with speciation as provided by the vendor for all materials currently in use and those in use for the previous two years except for ingredients/materials deemed proprietary by the vendor. Proprietary ingredients/materials shall be classified as resins, biocides, pigments solvents or inorganic compounds. The sum of the known ingredient weight

percentages and the proprietary ingredient/material groups shall equal 100 percent.

B. The new materials shall serve the same basic function, and the emissions shall be from the same location as the emissions from the current materials.

C. Any air contaminant ingredient in the new material is exempt from Special Condition Nos. 19D and 19E if:

(1) it is emitted at a rate (on a worst-case, sitewide basis) and has a short-term ESL and an annual ESL as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu g/m^3$)	Annual ESL ($\mu g/m^3$)
≤ 0.04	≥ 2 and < 500	≥ 0.2 and < 50
≤ 0.10	≥ 500 and < 3,500	≥ 50 and < 350
≤ 0.40	≥ 3,500	≥ 350

(2) it has a true vapor pressure at 68°F of less than 0.01 mm Hg, and it is not sprayed.

D. For all other new or increases in existing air contaminants, the following procedure shall be completed to determine if the short-term impacts are acceptable.

(1) Determine the emission rate of each air contaminant ingredient including emissions of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.

(2) Multiply the emission rate of the species by the unit impact multiplier for each emission point/ emission point group from the following table or from additional air dispersion modeling as required by Special Condition No. 19E to determine the off-property impact (Ground Level Concentration [GLC]) for each emission point/emission point group.

Emission Point or Emission Point Group	Worst-Case Impact EPN	Unit Impacts ($\mu g/m^3$ per lb/hr)
Bldg 1	1-7A	250
Bldg11	11-12A	136
Bldg 3/14	3-57	203.3
Bldg 37	37-02	145.3

Bldg 38	38-10	164.03
Bldg 20	20-4	130
Bldg 35	28-6	62.2
TO-1	TO-1	1.804

(3) Sum the impacts from each emission point/emission point group to determine a total short-term off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.

(4) Compare the total off-property impact to the short-term ESL for the air contaminant as follows.

$$\text{Total GLC}_{MAX} \leq ESL_{SHORT}$$

Where:

Total GLC_{MAX} = the sum of the short-term GLCs from each emission point.

ESL_{SHORT} = the short-term ESL of the new or existing air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Division. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

E. For all other new or increases in existing air contaminants, the following procedure shall be completed to determine if the annual impacts are acceptable.

(1) Multiply the total off-property impact (Total GLC_{MAX}) determined in Special Condition No. 19D(4) by 0.08 to determine an annual off-property impact (Annual GLC_{MAX}) for the new or existing air contaminant.

(2) Compare the annual off-property impact to the annual ESL for the air contaminant as follows.

$$\text{Annual GLC}_{MAX} \leq ESL_{ANNUAL}$$

Where:

ESL_{ANNUAL} = the annual ESL of the new or existing air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Division.

F. If new emission sources/emission source groups or facilities are added to the site as allowed under Special Condition No. 2, including each instance of setting a new emission point, relocating an existing emission point, or modifying the stack characteristics of an existing emission point, consistent with the changes allowed under Special Condition No. 2, then a unit impact multiplier (µg/m^3/lb/hr) shall be determined using a TCEQ-approved air dispersion model using the appropriate procedures as described in the most current version of the TCEQ Air Quality Modeling Guidelines. The unit impact multiplier for emission source groups shall be based on the stack that provides the greatest off-property concentration, and this unit impact multiplier shall be used in combination with those of the table in Special Condition No. 19D(2), as applicable, to determine a total off-property impact for the material. The total off-property impact (total GLC_{MAX}) shall not exceed the short term ESL for the material consistent with the equation at Special Condition No. 19D(4).

G. In lieu of Special Condition No. 19D or E, off-property impacts for one or more materials may be determined by other means of modeling and analysis, so long as the method uses a TCEQ-approved air dispersion model using the appropriate procedures as described in the most current version of the TCEQ Air Quality Modeling Guidelines. The total off-property impact (total GLC_{MAX}) shall not exceed the short term or annual ESL for the material, consistent with the equations at Special Condition Nos. 19D(4) and 19E(2).

H. If the off-property impacts of a new or replacement specie cannot meet the requirements of Special Condition No. 19C, D, or E then the speciated emission calculations and air dispersion modeling results shall be submitted to the TCEQ for review as a permit amendment under 30 TAC § 116.116(b). Such permit amendment shall be limited in scope to those aspects of the project that pertain directly to demonstrating that the off-property concentrations of the air contaminants for which the change is sought are acceptable to the TCEQ.

I. The short-term or annual emission rates from new or existing air contaminants shall not cause any increases in the short-term or annual emission rates as listed on the maximum allowable emission rates table (MAERT).

Recordkeeping

20. General Condition No. 7 regarding information and data to be recorded and maintained on file is supplemented as follows and shall constitute the method of demonstrating continuous compliance with the limits specified in the MAERT:

    A. Recordkeeping programs for those facilities authorized by the permit and under permit by rule (30 TAC Chapter 106) shall be established and maintained. Compliance with annual TPY emissions shall be based on a 12-month rolling average. Emissions calculations for verifying compliance shall be calculated at least once every month. The following information shall be maintained at the plant by the holder of this permit in a form suitable for inspection for a period of five years after collection and shall be made immediately available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction.

    B. Material Safety Data Sheets or other data sheets that provide 100 percent categorization with speciation as provided by the vendor for all materials currently in use and those in use for the previous two years except for ingredients/materials deemed proprietary by the vendor. Proprietary ingredients/materials shall be classified as resins, biocides, pigments, solvent, or inorganic compounds. The sum of the known ingredient weight percentages and the proprietary ingredient/material groups shall equal 100 percent. The data may be kept in a hard copy format or an electronic format on site using a web-based system.

    C. The following shall be recorded and kept in a hard copy format or an electronic format:

        (1) Data of daily coating material usage, compiled no less frequently than once each month, for each press, maker, or coating line covered by this permit;

        (2) Actual hours of each press, maker, or coating line covered by this permit on a daily basis compiled no less frequently than once each month;

        (3) Chromium plating/anodizing ampere hours for each plating anodizing tank on a daily basis, compiled no less frequently than once each month;

        (4) Pressure drop across each dust collection system in the mix and mill facility on a weekly basis;

        (5) Solvent throughput for the Methyl Ethyl Ketone Storage Tank (ST-5) on a monthly basis; and

(6) Natural gas consumption for each facility or group of facilities covered by this permit on a monthly basis.

D. The data recorded in Special Condition No. 20C shall be used to produce a monthly report, completed by the 25th day of the subsequent month and kept on-site that represents:

(1) The air contaminant emissions from each emission point or group of emission points noted in Special Condition No. 20C and as shown on the MAERT in lb/hr on a daily average basis;

(2) The air contaminant emissions from each emission point or group of emission points noted in Special Condition No. 20C and as shown on the MAERT in tons per year for a rolling consecutive 12-month period; and

E. Whenever Special Condition No. 19 (chemical flexibility) is used, the following records shall be kept on-site: speciated emissions, speciated ESL values, new ER determination, the calculations of Special Condition Nos. 19D and 19E, and the date when the substitution occurred.

F. The daily, monthly, and annual records required in Special Condition No. 20C, D, and E shall be kept in a central location in the plant with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions. The records may be kept in a hard copy format or an electronic format.

G. Records of the three-hour block average temperatures for the regenerative thermal oxidizer as required by Special Condition No. 16B.

H. Records of capture system monitoring required by Special Condition No. 17C.

I. A log book or information maintained in electronic files shall be kept on-site to record the date of each production and pollution control equipment and connecting ductwork inspection required by Special Condition No. 18, name of the inspector, and any repair and maintenance work performed, with emphasis given to the amount of time elapsing until the repairs or corrections are made. The maintenance log book/data file shall be maintained by the holder of this permit on a rolling 12-month basis, and the data shall be retained for at least two years following the date the data is obtained. The log book/data file shall be made available at the request of personnel from the TCEQ or any air pollution control agency with jurisdiction.

21. A log shall be maintained and updated on a monthly basis that includes:

A. Records of new or replacement facilities installed pursuant to Special Condition No. 2A and any modifications or changes to representations under Special Condition No. 2B as well as any sources installed under 30 TAC Chapter 106. This recordkeeping requirement does not apply to the replacement of component parts or to any activity that can be regarded as routine repair and maintenance under federal and state law.

B. Records of the shutdown and/or removal of facilities covered by this permit and facilities covered by standard exemption, special exemption, or permit by rule (30 TAC Chapter 106).

C. Records of stack, vent or fugitive emission point additions, removals and the equipment associated with these changes. For new emission points the location, height, diameter, temperature flow rate, and type of rain protection used, if any, shall be included in the listing.

D. A listing of all air emission sources at the site including, a brief description of the equipment, its location within the facility, the associated emission point numbers, the date of construction and the construction authorization used.

These records shall be maintained on at least a ten-year retention basis. These records shall be maintained on-site and made available upon request to TCEQ personnel or to any air pollution control program having jurisdiction.

Reporting

22. An annual report shall be submitted to the TCEQ Abilene Regional Office no later than January 31 of each year that includes the following:

A. A copy of the logs required by Special Condition Nos. 21A, B, and C that lists the changes made to the facility for the previous calendar year; and

B. The listing of all air emission sources required by Special Condition No. 21D.

Notification

23. The permit holder shall provide notifications to the TCEQ Abilene Regional Office at least 10 days in advance of the following:

A. The start of construction or modification of any source covered by Special Condition No. 2A, B or C, and the notification shall contain the following:

(1) A detailed description of the physical or operational change including the effect on existing equipment and existing equipment emission rates;

(2) A plant layout depicting the existing equipment and any new or replacement equipment to be added to the facility;

(3) A construction schedule;

(4) A statement of applicability for any New Source Performance Standard (NSPS) (40 CFR Part 60), National Emission Standard for Hazardous Air Pollutants (NESHAPS) (40 CFR Part 63), and any state regulations;

(5) Calculations of criteria pollutant emission rates and speciated emission rates for the project and any other existing equipment affected by the changes associated with the project;

(6) A summation of the potential criteria pollutant emission rates from the completed and proposed approved changes, a comparison of these rates to the PAL and the MAERT, and any in-plant administrative procedures, if required to assure that the actual emissions are maintained less than the limits of the MAERT.

B. An activity related to the approved changes that have not been demonstrated to the satisfaction of the TCEQ to meet all the requirements of this permit and any applicable state or federal rules may be disapproved. At that time all construction activities shall cease until an appropriate construction authorization is obtained.

C. The permit holder shall notify the TCEQ Abilene Regional Office within 10 days after the actual start of operation of any source covered by Special Condition Nos. 2A, B and C, and the notification shall contain the following:

(1) Refer to the notification of start of construction including the date of the notification and a brief description of the change;

(2) Verification that the physical or operational change was completed as described in the original notification; and

(3) The actual date of the start of operation of the change.

Initial Demonstration of Compliance

24. Except as noted below, all new sources constructed or modified as allowed under Special Condition Nos. 2A, B and C, which involve installation or modification of a VOC capture system, or which involve installation of a new VOC control device or additional loading on an existing VOC control device, stack sampling and/or other testing shall be performed to demonstrate initial compliance with the emission limitations contained in this permit and the emission standards contained in any applicable state or federal rules including (but not limited to) emission control device control efficiency. Sampling and/or testing shall be completed within 180 days of start of operations or as required by applicable state or federal rules whichever is sooner.

    A. For each capture system the following shall be completed:

        (1) For capture systems for which 100 percent capture efficiency is assumed, confirm that the capture system meets the requirements of Reference Method 204; or

        (2) Conduct a performance test through the use of EPA Test Methods 204A through 204F, as appropriate, or by other methods approved by the TCEQ to demonstrate that the capture system meets 100 percent capture efficiency or the capture efficiency represented in the system design.

    B. For each add-on control device the following shall be completed:

        (1) For sources affected by 40 CFR Part 60, Subpart RR or 40 CFR Part 63, Subpart KK or 40 CFR Part 63, Subpart JJJJ performance testing to demonstrate compliance with these rules as well as testing to establish total control efficiencies. Performance testing shall be consistent with the emission standards elected under Special Condition No. 7.

        (2) For sources affected by 40 CFR Part 63, Subpart N performance testing to demonstrate compliance with these rules as well as testing to establish total control efficiencies.

    C. The permit holder is responsible for providing sampling and testing facilities, conducting the sampling and testing operations at the permit holders' expense, and providing safe access to observe sampling.

    D. The TCEQ Abilene Regional Office shall be contacted as soon as the initial testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting.

        The notice shall include:

(1) Date for pretest meeting.
(2) Date sampling will occur.
(3) Name of firm conducting sampling.
(4) Type of sampling equipment to be used.
(5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written description of any proposed deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

E. During stack emission testing, the plant or facilities, being tested shall operate at production rates representative of the reasonably achievable maximum operating rates.

F. Requests to waive testing for any pollutant specified in A of this condition shall be submitted to the TCEQ Air Permits Division. Test waivers and alternate/equivalent procedure proposals for NSPS testing which must have EPA approval shall be submitted to the TCEQ Regional Office.

G. Three copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual.

The reports shall be distributed as follows:

One copy to the TCEQ Abilene Regional Office.
One copy to the TCEQ Office of Air
One copy to the TCEQ Central File Room, Austin.

25. Within five years of the most recent performance tests the performance tests shall be repeated for each control device and every five years thereafter.

Pollution Prevention

26. Good housekeeping shall be exercised to minimize fugitive emissions including the following:

    A. Solvent laden towels shall be placed into covered containers located near each press immediately after use to reduce fugitive emissions. Towels shall remain in covered containers until disposed of in accordance with applicable hazardous waste regulations.

    B. All chemical spills shall be cleaned up promptly using appropriate cleanup procedures and the waste materials, rags, and other absorbent materials shall be stored in sealed containers until properly removed from the site by a licensed disposal service.

    C. All waste coatings and solvents shall be stored in sealed containers.

27. All equipment that has the potential of emitting air contaminants shall be physically identified and marked in a conspicuous location as follows:

    A. The facility identification numbers as submitted to the Emissions Inventory Section of the TCEQ.

    B. The EPNs as listed on the MAERT.

Dated May 17, 2013

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 71623 and PAL 4

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
38-1, 38-2, 38-3, 38-4, 38-5, 38-6, 38-7, 38-8, and 38-9	PSML Oven No. 1 Curing PSML Oven No. 2, Coating Station Enclosure, Web Cleaner, Max Mixing Cart	VOC	32.50	142.00
		NO_x	0.33	1.45
		CO	0.24	1.10
		PM	0.024	0.10
		SO_2	0.002	0.01
20-3	Printer/Coater Print Station, Coating Station, UV Cure Oven	VOC	1.50	6.60
		Ozone	0.01	0.04
		Ammonia	0.06	0.26
20-4	Printer/Coater Surface Treater Nos. 1,2, and 3	Ozone	0.03	0.13
20-5	Flexographic Laminator	VOC	1.50	6.60
		Ammonia	0.06	0.26
28-1A	Lamination/Extrusion Line A	VOC	0.30	1.31
28-3A	Lamination/Extrusion Line A	VOC	0.30	1.31
28-4A1a, 28-4A2a, 28-4A3a, 28-4A4a, 28-5A	Resin Dryers Nos. 1A, 3A, 5A, 7A and Extrusion Preheater	NO_x	0.15	0.65
		CO	0.03	0.14
		PM	0.004	0.02
		SO_2	0.001	0.006
28-12	Lamination/Extrusion Line A Pyrolysis Oven	VOC	0.07	0.31
37-01	Screen Printer Station No. 1	VOC	9.20	40.00

Project Number: 175283

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
37-02	Screen Printer Station No. 2	VOC	9.20	40.00
37-04	Press and Dryer Make Ready Room	VOC	1.50	6.60
37-05	Press and Dryer Corona Treater	Ozone	0.01	0.04
37-06	Press and Dryer Web Preconditioner and Web Conditioner	NO_x	0.04	0.16
		CO	0.01	0.03
		PM	0.001	0.001
		SO_2	0.001	0.001
TO-1	Regenerative Thermal Oxidizer Including Products of Combustion from Natural Gas Fired Dryers (5)	VOC (6)	440.00	---
		NO_x	16.50	63.18
		CO	19.94	87.34
		PM	1.17	5.13
		SO_2	0.08	0.16
3-RMWVS, 3-SMV, 1-CIPCOND, 1-CIPCLEAN, SM22W, SM22E, 14-3, 3-1, 3-3411, 3-3412, 3-19V, 3-21V, 3-KETTDR1, 3-KETTDR2, DC01, DC02, DC03, DC04	Mix and Mill Kettles, Roll Mills, Mixers, Pony Mixers, Sand Mills, and Wash Vats	VOC	21.00	45.00
		PM	10.00	5.00
ST-5	MEK Storage Tank	VOC	48.00	0.75
Chrome - 01	Chromium Plating and Anodizing	Cr	0.001	0.001
All EPNs	All Sources at the Site	VOC	---	999.00

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

(3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.

VOC	- volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x	- total oxides of nitrogen
SO_2	- sulfur dioxide
PM	- total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10}	- total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented
$PM_{2.5}$	- particulate matter equal to or less than 2.5 microns in diameter
CO	- carbon monoxide
HAP	- hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
Cr	Total chromium

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

(5) Sources routed to EPN TO-1 include the presses and dryers for Maker Nos. 31, 32, 33, 34, 35, 36 and Egan and LPP presses.

(6) Annual site-wide VOC emissions shall not exceed 999.00 tpy. Total annual emissions from emission sources that do not have a specific annual emission limit shall not cause the site-wide VOC emissions limit to be exceeded.

Date: May 17, 2013